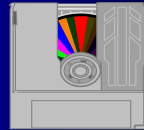


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Field Loadable & User-Modifiable Software

Order 8110.49



Dennis Wallace
Rotorcraft ACO (ASW-170)
Dennis.wallace@faa.gov

1

Order 8110.49

- Approval of Field-Loadable Software (FLS)
- Approval of FLS by Finding Identity through the Parts Manufacturer Approval (PMA) Process
- Approval of Airborne Systems and Equipment Containing User-Modifiable Software (UMS)

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DO-178B References to FLS

- Field-Loadable Software (FLS) and Loading References:
 - System Design: Sections 2.0 and 2.5
 - SW Process: 6.4.3a., 7.2.1d., e.; 7.2.8, 8.3g.
 - SW Data: 11.1g., 11.2c.(3), 11.4b.(8), (9);
11.10g., 11.11, 11.15, 11.16, 11.20g.

3

Definitions

Field-Loadable Software	Software that can be loaded without removal of the equipment from the aircraft installation.
User-Modifiable Software	Software intended for modification by the airplane operator without review by the certification authority, airframer, or equipment manufacturer.
Option-Selectable Software	Software that contains approved and validated components that may be activated by the user.

4

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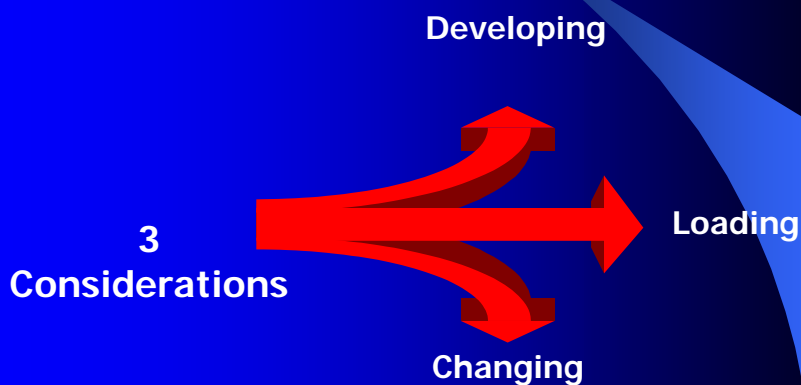
Field Loadable & User-Modifiable Software

Examples

- Field-Loadable Software
 - Engine Control Software
 - Flight Control Software
 - Boeing 777 Has Many Systems With FLS
- User-Modifiable Software
 - Non-Required, Airline-Specific Electronic Checklists
- Option-Selectable Software
 - Selection Of Sensors For An FMS

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Approval of FLS

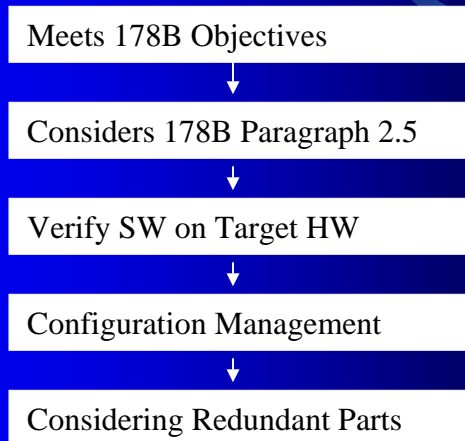


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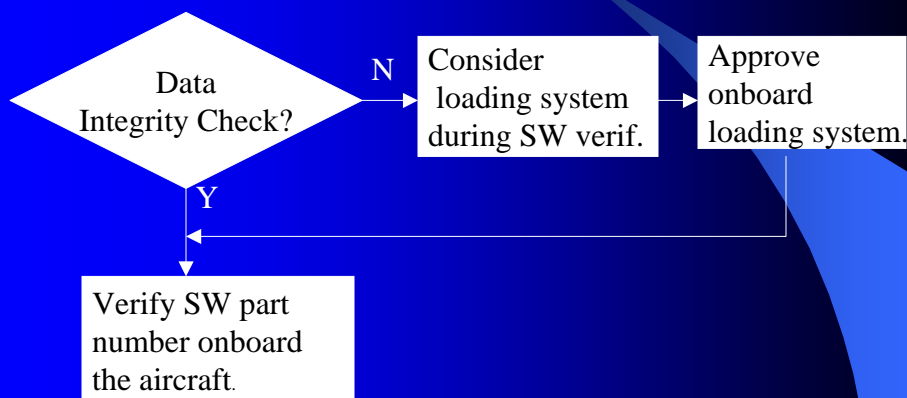
Field Loadable & User-Modifiable Software

Approval of FLS Developing



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Approval of FLS Loading

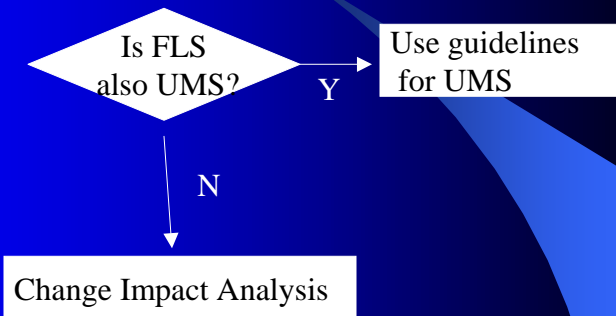


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Approval of FLS Changing



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Installation of FLS

-
- A clipboard with a silver clip at the top, holding a white sheet of paper with a checklist. The checklist is titled "Documentation to Include the Following Items:" and lists seven items, each preceded by a small oval bullet point. The items are: a) Aircraft and HW Applicability, b) Verification Procedures, c) Post Load Verification and/or Procedures, d) Actions for Unsuccessful Load, e) Reference to Approved Loading Procedures, f) Maintenance Record Entry Procedures, and g) Reference to AFM, AFMS, or Ops Manual.
- Documentation to Include the Following Items:
 - a) Aircraft and HW Applicability
 - b) Verification Procedures
 - c) Post Load Verification and/or Procedures
 - d) Actions for Unsuccessful Load
 - e) Reference to Approved Loading Procedures
 - f) Maintenance Record Entry Procedures
 - g) Reference to AFM, AFMS, or Ops Manual

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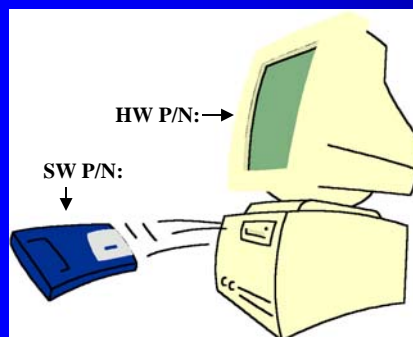
Field Loadable & User-Modifiable Software

Maintenance & Part Marking of FLS

- Maintenance Procedure in Aircraft Maintenance Manual
- Procedure to Include Reading of SW Version
- Procedure to Include Part Number in Maintenance Records
- Changes Reflected in Appropriate Manual or Logbook

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Maintenance & Part Marking of FLS



Procedure to Verify
SW Load



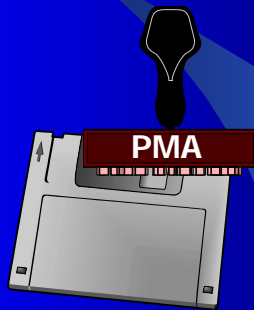
Procedure to Verify
Nameplate & SW Load

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Parts Manufacturer Approval of Field-loadable Software



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Purpose

- Provides Guidelines for Approving FLS Through PMA
- Limited to Identity With or Without a Licensing Agreement
- Does Not Cover Test and Computation

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Field Loadable & User-Modifiable Software

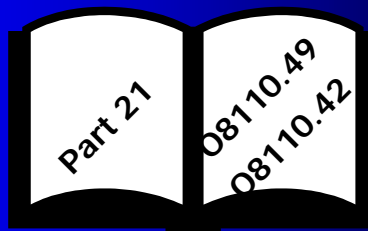
Technical Information

- FLS Is Beneficial to Airlines and Applicants
- Order 8110.42, "PMA Procedures," Does Not Specifically Address Software
- CFRs 21.301, 303, and 305 Do Not Specifically Address Software
- Data Being Loaded Is Approved, Not Media

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Procedures

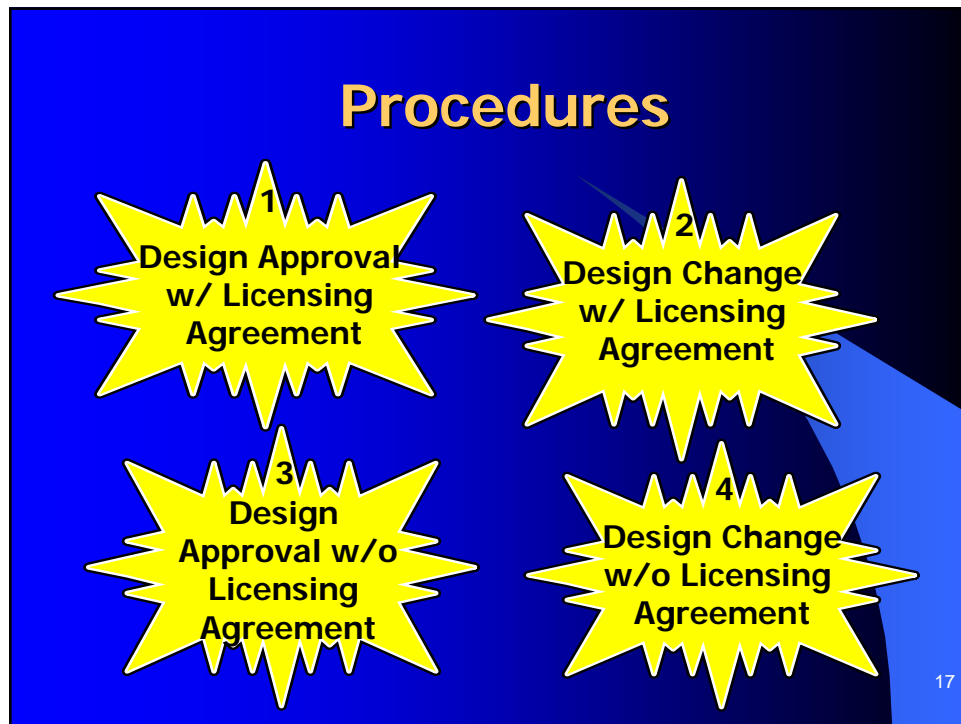
- Follow Part 21 and O8110.42 in Conjunction With the Software-Specific Procedures in O8110.49



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**Design Approval
Identity With Licensing
Agreement**

- Reference O8110.42, 8(a)(3)(a)
- FLS Should Be Approved Through TC, STC, ATC
- FLS Should Be Installed Via Service Bulletin Or Similar Means
- Configuration Management Process Should Be In Place To Assure Software Part Number, Hardware Part Number, Aircraft Series, etc. Are Accurate

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Design Change Identity With Licensing Agreement

- Reference O8110.42, 8(h)(5)
- Applicant Should Coordinate Change With TC, STC, ATC Holder
- Change Impact Analysis
- Determine Minor/Major Classification
 - Major change ⇒ O8110.42 8(h)(5)(a)
 - Minor change ⇒ O8110.42 8(h)(5)

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Design Approval Identity W/o Licensing Agreement

- Order 8110.42, 8(a)(3)(b) - Parts Must Be Identical In "All Respects"
- FLS Should Be Identical To The Software On The TC, STC, ATC Approval
 - Bit-by-bit Comparison
 - Evidence of Identical Type Design Data - DO-178B Section 9.4

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Design Change Identity w/o Licensing Agreement

- Change Considered Major
- Reference Order 8110.42, 8(h)(5)(a)

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Summary

- Chapter 5 - Approval of FLS
- Chapter 6 – Approval of FLS by Finding Identity through PMA
- Reference DO-178B, Part 21, and Order 8110.42

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Approval of Airborne Systems and Equipment Containing User-modifiable Software



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Purpose

- To Provide Guidelines To ACO Engineers and DERs For Approval of Systems With User-Modifiable Software (UMS)
- To Encourage Working With Flight Standards Personnel:
 - Maintenance Inspectors, Avionics Inspectors, and Operations Inspectors

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DO-178B References to UMS

- User-Modifiable Software (UMS)
References:
 - System Design: Sections 2.0 and 2.4a.-d.
 - SW Process: 5.2.3, 7.2.2b.
 - SW Data: 11.1g., 11.10g., 11.20g.

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Technical Information

Biggest Concerns:

- ☠ Corruption of Non-modifiable, Safety-related Software
- ☠ Change Control Problems in the Field
- ☠ Compelling but Invalid Information in the Cockpit

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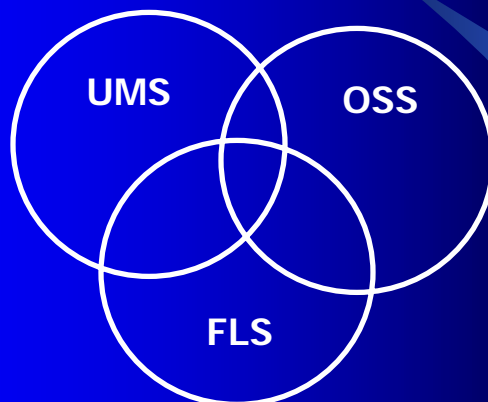
Field Loadable & User-Modifiable Software

Definitions

User-Modifiable Software	Software intended for modification by the airplane operator without review by the certification authority, airframer, or equipment manufacturer.
Option-Selectable Software	Software that contains approved and validated components that may be activated by the user.
Field-Loadable Software	Software that can be loaded without removal of the equipment from the aircraft installation.

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Definitions



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Databases, etc?

- What About Navigation or Terrain Databases?
- What About Programmable Waypoints or Other Programmable Database-Like Items?

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**Order Addresses UMS
Only**

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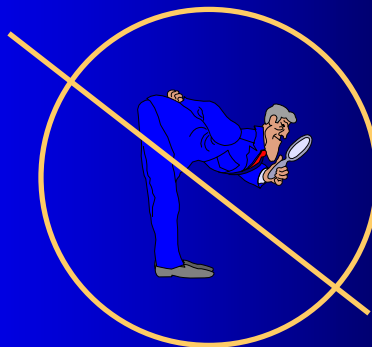
Earlier Version of DO-178 (Section 6)

- Earlier Versions of DO-178 Contain No Guidance for User-Modifiable Software
- Use DO-178B Guidance for The User-Modifiable Portions

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Safety Considerations

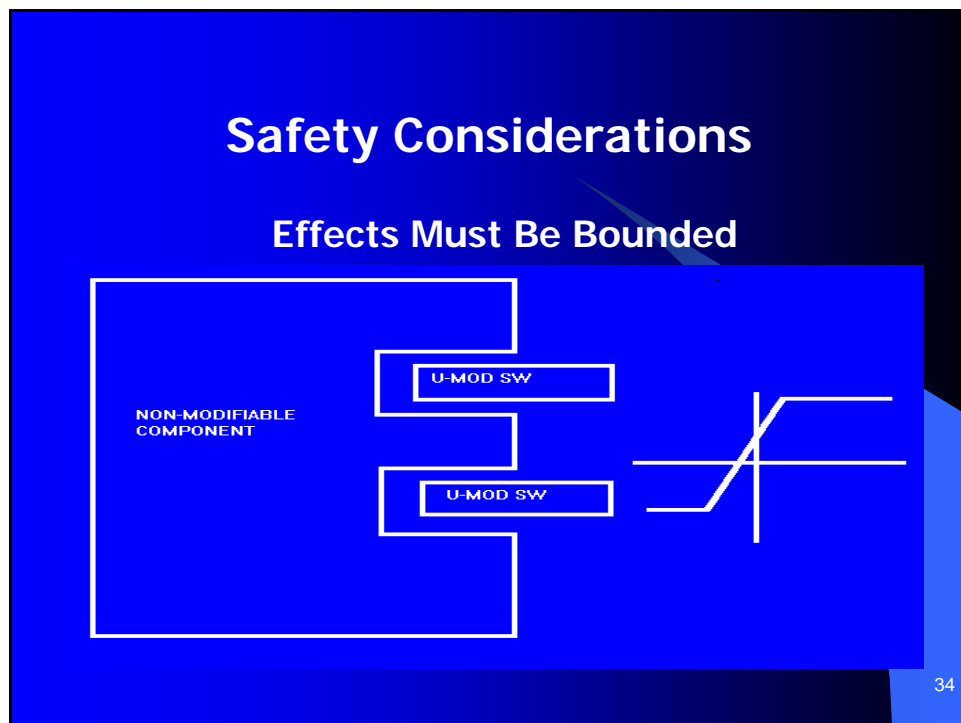
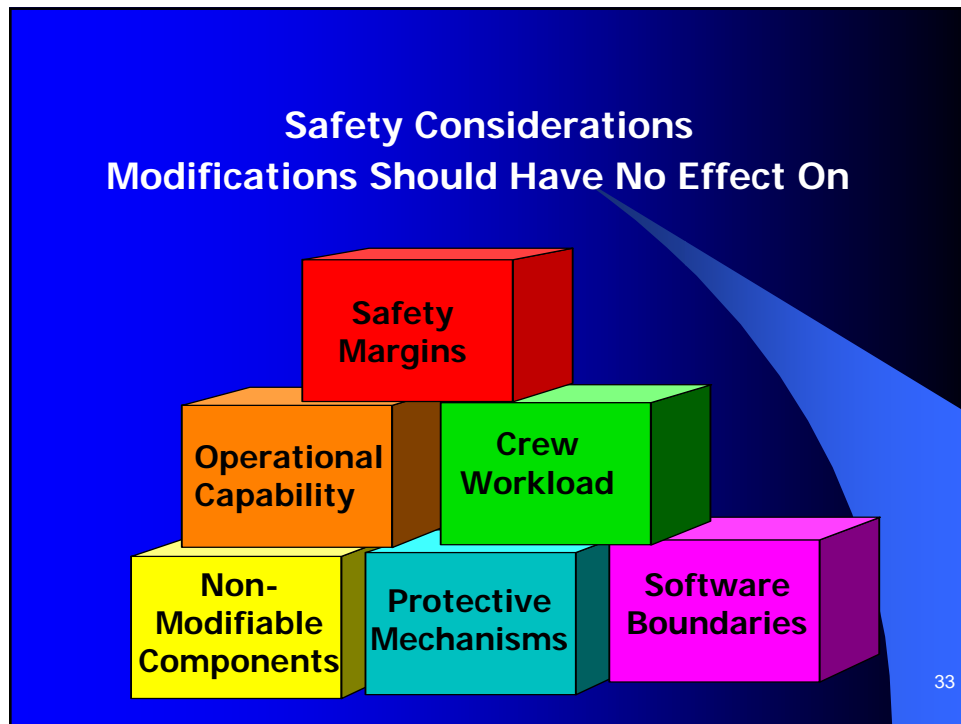
- **Once Certified as UMS There is No Certification Authority Oversight**



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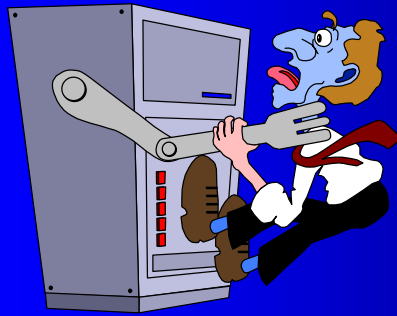
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Identification of Displayed Data



- Obvious or Explicit Indication That the Data is Not Cert Authority Approved

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Performance Parameters

- Modifications to Provide or Revise Performance Parameters Requires Certification Authority Review and Approval
- Examples of Parameters
 - Safety margins
 - Operational capabilities
 - Crew workload

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Performance Parameters

- Changing Data To Determine Aircraft Performance Parameters = Major Change



- User-Modifiable Designation Lost

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Protection

- UMS Components Shouldn't Affect Non-UMS Components
- Assure Protection Is Developed to at Least Same Level of Robustness Required of the Most Robust Non-UMS Component

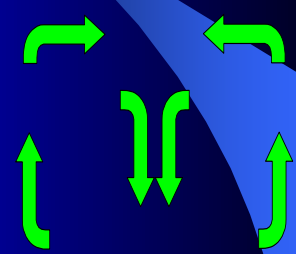
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Protection


- Two Considerations
 - Operating In:
 - Protection in the design and operation
 - Changing Out:
 - Protection during modification



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Protection

- **Examples**
 - Partitioning
 - Hardware Modes
 - Encoding
 - Tools
 - Modifications
 - Loading Protection

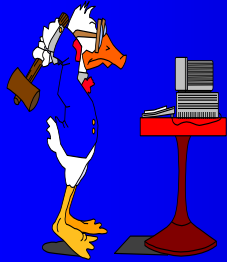


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Protection

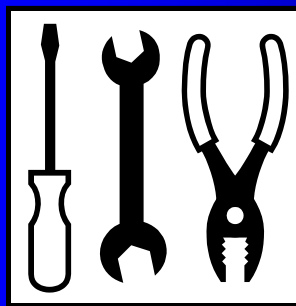


Protect Against Breaches

- Accidental Breach
 - Low Likelihood Under Reasonably Probable Circumstances
 - (Subjective statement of probability - not a xx.1309 definition)
- Intentional Breach
 - Low Likelihood Without Undue Effort

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Tools

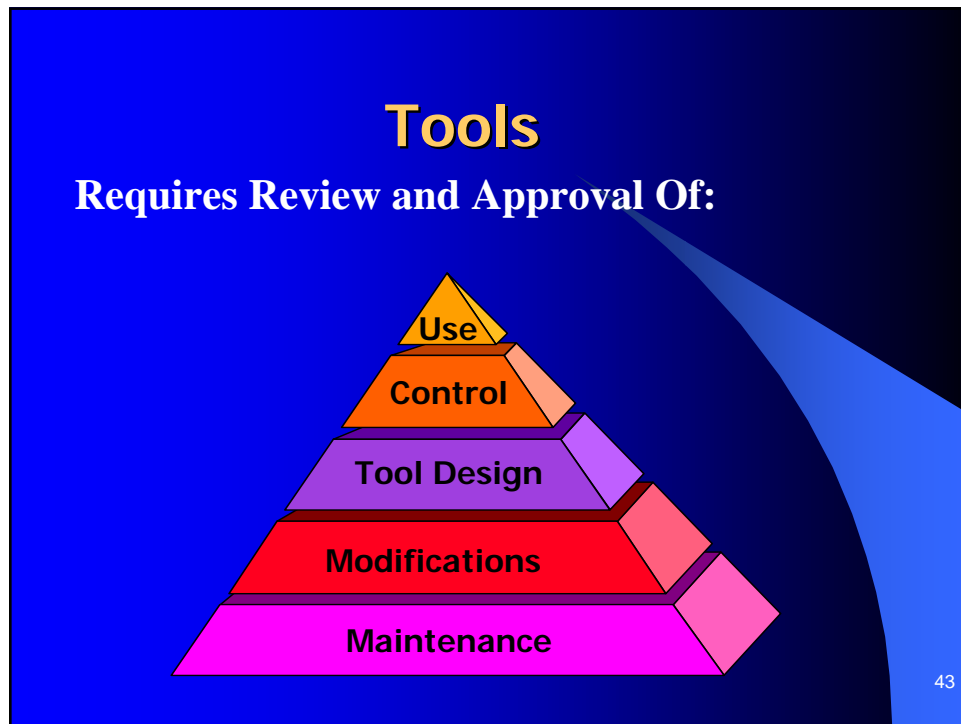


- Used to Enforce Protection
 - Not DO-178B Qualified Tools?
- Demonstrated As the Only Means To Modify UMS Component

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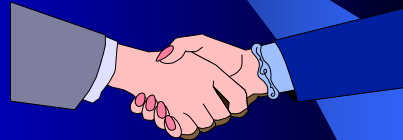
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Tools

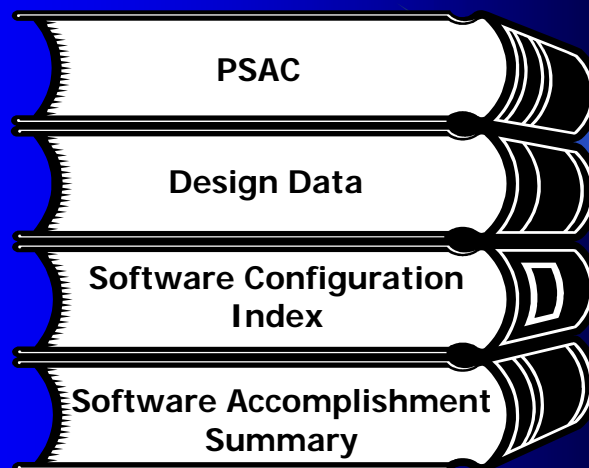
Maintenance Approval of Tools

Jointly By:
ACO Engineer
Operational Authority
Maintenance Authority



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Data Requirements



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Other Considerations

- User Follows the Approved Procedures for Modifications to UMS
- User Responsible for Configuration Management, Quality Assurance, and Verification of the Software
- Changing Anything Besides UMS Can Result in Certificate Being Rescinded

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Summary

- Order 8110.49 Provides Guidelines For Approval of Systems & Equipment Containing UMS
- Provides Guidelines On:
 - Safety Considerations & Safety Parameters
 - Protection
 - Tools
 - Data Requirements
 - Working With FSDO Personnel

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